

EXHIBIT C

12/5/2024

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)

)

Individual and)

Representative)

Plaintiffs,)

)

v.)

)

META PLATFORMS, INC.,)

)

Defendant.)

)

Case No. 3:23-cv-03417-VC

** CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER **

Videotaped Deposition of meta Platforms, Inc.

by and through its corporate designee

SY CHOUDHURY

San Francisco, California

Thursday, December 5, 2024

Reported Stenographically by

Michael P. Hensley, RDR, CSR No. 14114

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1 individual capacity that you would change now that
2 you're testifying on behalf of Meta?

3 A. No.

4 ATTORNEY HARTNETT: I would just object to
5 the extent that any of it is beyond the scope of
6 notice.

7 But you can answer.

8 BY ATTORNEY PRITT:

9 Q. You've been designated as Meta's 30(b)(6)
10 witness regarding efforts to obtain text data for AI
11 training; correct?

12 A. Third-party text data licensing, correct.

13 Q. Okay. Well, let's look at the deposition
14 notice. It was marked as Exhibit 850 in your
15 individual deposition.

16 If you look at the second page, you'll see
17 a topic 8.

18 Do you see what I'm referring to?

19 A. Yes.

20 Q. Can you read that topic?

21 A. Sure.

22 [As Read] Meta's efforts to acquire

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1 text data to train the Meta language
2 models including licensing efforts if any.

3 Q. I'll ask for the record, are you prepared
4 to testify today as to the extent of Meta's efforts
5 to acquire text data to train the Meta language
6 models including licensing efforts if any?

7 A. Yes.

8 Q. I understand that you, in fact, are not
9 being offered to testify to all of Meta's efforts to
10 acquire text data to train the Meta language models
11 including licensing efforts if any, but I will allow
12 your counsel to clarify if that's true.

13 ATTORNEY HARTNETT: Yes. Thank you.

14 Just for the record, we understood, and
15 through our discussions with plaintiffs' counsel and
16 the briefing on this issue, that the scope of this
17 deposition would be concerning commercial outreach
18 including but not limited to licensing regarding
19 acquiring text data for the Meta language models. I
20 would -- we don't need to belabor the points here.
21 We'll brief them if needed, but -- including through
22 plaintiffs' own briefing of that issue on the

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1 30(b)(6) dispute; so today he'll be prepared to
2 testify to that topic.

3 ATTORNEY PRITT: Yes. Thank you,
4 Ms. Hartnett.

5 ATTORNEY HARTNETT: Just -- sorry. I
6 should just add the topics 1 and 2 we believe cover
7 the landscape of Meta's efforts to acquire text data
8 to train the Meta language models other than
9 commercial outreach including licensing.

10 ATTORNEY PRITT: Thank you.

11 Just for the record, we disagree and
12 discussed this issue with Ms. Hartnett and will
13 continue to meet and confer with Meta's counsel to
14 see if we can address plaintiffs' concerns with
15 respect to the scope of the topic that the witness
16 is prepared to testify about today.

17 But to confirm, currently the witness is
18 prepared to testify about commercial outreach
19 including but not limited to licensing regarding
20 acquiring text data for the Meta language models; is
21 that correct?

22 ATTORNEY HARTNETT: Yes.

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1 ATTORNEY PRITT: Okay. Thank you.

2 ATTORNEY HARTNETT: And just to put it on
3 the record, we were not agreeing to any additional
4 30(b)(6) time notwithstanding our -- in light of our
5 dispute, but we can take that up separately. I just
6 want to put you on notice of that given the limited
7 time remaining.

8 ATTORNEY PRITT: Okay. Thank you.

9 BY ATTORNEY PRITT:

10 Q. So what, Mr. Choudhury, what did you do to
11 prepare to discuss -- sorry. Strike that.

12 Mr. Choudhury, what did you do to prepare
13 to testify about commercial outreach including but
14 not limited to licensing regarding acquiring text
15 data for the Meta language models?

16 A. We had a premeeting, two -- roughly two
17 two-hour premeetings to just go over the topics, and
18 that was my preparation.

19 Q. And who attended those meetings?

20 A. The -- my two counsels here, Kathleen and
21 Nikki, and myself.

22 Q. Did anyone else attend those meetings?